

1 MICHAEL W. BOLECHOWSKI (SBN: 118725)
2 MARK C. RASKOFF (SBN: 72330)
3 DAVID L. HART (SBN: 219517)
BISHOP, BARRY, HOWE, HANEY & RYDER
3 2000 Powell Street, Suite 1425
Emeryville, California 94608
4 Telephone: 510-596-0888
Facsimile: 510-596-0899

5 Attorneys for all Defendants except Prasad Lakireddy

6

7

8

IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 JANE DOE I; *et al.*,

Plaintiffs,

11 vs.

13 LAKIREDDY BALI REDDY, *et al.*,

Defendants.

14 Case No. C-02-5570-WHA

15 SECOND AMENDED RESPONSES TO
PLAINTIFF JANE DOE I'S FIRST SET OF
INTERROGATORIES TO DEFENDANT
LAKIREDDY BALI REDDY

AMENDED

16 PROPOUNDING PARTY: PLAINTIFF JANE DOE I

17 RESPONDING PARTY: LAKIREDDY BALI REDDY

18 SET NUMBER: ONE (AMENDED)

20 14. Did YOU ever have SEXUAL RELATIONS with any of the PLAINTIFFS?

21 **RESPONSE:** Upon advice of counsel responding Party asserts his Fifth Amendment right
22 against self-incrimination. Without waiving the above objection responding party answers, yes.

23 15. If YOUR answer to Interrogatory No. 14 is yes, list the PLAINTIFFS with whom you had
24 SEXUAL RELATIONS.

25 **RESPONSE:** Upon advice of counsel responding Party asserts his Fifth Amendment right against
26 self-incrimination. Without waiving the above objection responding party had sexual relations
27 with Doe I, Doe II, Doe III and Chanti Jyosthna Devi Prattipati.

28

BISHOP, BARRY, HOWE, HANEY & RYDER
A PROFESSIONAL CORPORATION
2000 Powell Street, Suite 1425, Emeryville, California 94608
Tel. No. (510) 596-0888 Facsimile (510) 596-0899

622-22888

1
2 16. For each PLAINTIFF listed in response to Interrogatory No. 15, state the number of times
3 you had SEXUAL RELATIONS with the PLAINTIFF. (If YOU cannot provide the exact
4 number, provide your best approximation.)

5 **RESPONSE:** Upon advice of counsel responding Party asserts his Fifth Amendment right against
6 self-incrimination. Without waiving the above objections responding party provides the
7 following explanation:

- 8 1. Doe I-Responding party does not remember the exact number of times he had sexual
9 relations with Doe I. Responding party believes it to be less than ten.
10 2. Doe II- Responding party does not remember the exact number of times he had sexual
11 relations with Doe II. Responding party believes it to be less than ten.
12 3. Doe III- Responding party does not remember the exact number of times he had sexual
13 relations with Doe III. Responding party believes it to be between ten and thirty times.
14 4. Chanti Jyosthna Devi Prattipati- Responding party does not remember the exact number
15 of times he had sexual relations with Chanti Jyosthna Devi Prattipati. Responding party
16 believes it to be less than ten.

17
18 17. For each PLAINTIFF listed in response to Interrogatory No. 15, state the earliest date and
19 the most recent date on which you had SEXUAL RELATIONS with the PLAINTIFF. (If YOU
20 cannot provide the exact date, provide your best approximation.)

21 **RESPONSE:** Upon advice of counsel responding Party asserts his Fifth Amendment right
22 against self-incrimination. Without waiving the above objections responding party provides the
23 following explanation:

- 24 1. Doe I-Responding party does not remember the first time he had sexual relations with Doe
25 I. Responding party believes the last time he had sex with Doe I was in January of 2000.
26 2. Doe II- Responding party does not remember the exact date he had sexual relations with
27 Doe II. Responding party believes the first and last time he had sex with Doe II was 1999.
28 Responding party cannot be more specific.

- 1 3. Doe III- Responding party does not remember the first time he had sexual relations with
 2 Doe III. Responding party believes the last time he had sex with Doe III was either in
 3 1995 or 1996.
 4 4. Chanti Jyosthna Devi Prattipati- Responding party does not remember the exact date he
 5 had sexual relations with Chanti Jyosthna Devi Prattipati. Responding party believes the
 6 first and last time he had sex with Chanti Jyosthna Devi Prattipati was 1999. Responding
 7 party cannot be more specific.

- 8
- 9 18. For each PLAINTIFF listed in response to Interrogatory No. 15, state the physical
 10 location(s) where you had SEXUAL RELATIONS with the PLAINTIFF. (If YOU cannot provide
 11 the exact location(s), provide your best approximation.)

12 **RESPONSE:** Upon advice of counsel responding Party asserts his Fifth Amendment right against
 13 self-incrimination. Without waiving the above objections responding party provides the following
 14 explanation:

- 15 1. Doe I-Responding party had sex with Doe I in her apartment in Berkeley, defendant Vijay
 16 Lakireddy's home, and his home in India.
 17 2. Doe II- Responding party had sex with Doe II in her apartment in Berkeley.
 18 3. Doe III- Responding party had sex with Doe III his home in Velvadam and Doe III's
 19 apartment in Berkeley.
 20 4. Chanti Jyosthna Devi Prattipati- Responding party had sex with Chanti Jyosthna Devi
 21 Prattipati in her apartment in Berkeley.

- 22
- 23 19. In YOUR PLEA AGREEMENT, YOU admit that "[b]etween 1986 and January 2000,
 24 [YOU] agreed with [YOUR] codefendants and others to bring Indian nationals into the United
 25 States on the basis of fraudulent visas." IDENTIFY all the "Indian Nationals" whom you "agreed
 26 with [YOUR] codefendants and others to bring . . . into the United States on the basis of
 27 fraudulent visas."

28 **RESPONSE:** I have responded to discovery based on the advice of my criminal counsel to assert

1 my Fifth Amendment privilege against self-incrimination where necessary. I have been informed
 2 that this court has ruled that I am not entitled to assert my Fifth Amendment rights against self-
 3 incrimination and that I must respond to discovery. I also understand that under Federal Rule of
 4 Civil Procedure 37, this Court has the power to enter monetary sanctions and other sanctions that
 5 could cause me and my family great economic harm. Although I respectfully disagree with the
 6 Court's Order I am providing the following answer because I fear this Court's sanctions. I am
 7 making no voluntary waiver of my Fifth Amendment rights against self-incrimination and I do
 8 not waive my rights to judicially challenge this Court's Order.

9 I assisted the following individuals; Doe I, Doe II, Doe III, Doe IV, Doe V, Doe VI, Doe VIII,
 10 Jhansi Vemireddy, Ambika Velvadapu, Koteswara Gurrala, Koteswari Patakottu, Sriram Reddy
 11 Kudumula, Kota Reddy Kudumula, Somulu Garlapati, Ramulamma Chattu, Gopal Yerragunta,
 12 Kittemma Yerragunta, Sudha Mallu, Krishna Reddy Mallu, Shaik Ali Khan, Shaik Kudan Saheb,
 13 Shaik Meera Vali and Shaik Subhani.

14 I have reviewed my plea agreement in its entirety and am unable to more specifically
 15 identify any other person referenced in my plea agreement.

BISHOP, BARRY, HOWE, HANEY & RYDER
 A PROFESSIONAL CORPORATION
 2000 Powell Street, Suite 1425, Emeryville, California 94608
 Tel. No. (510) 596-0888 Facsimile (510) 596-0899

622-22888

28
 27
 26
 25
 24
 23
 22
 21
 20
 19
 18
 17
 16
 15
 14
 13
 12
 11
 10
 9
 8
 7
 6
 5
 4
 3
 2
 1

SECOND AMENDED RESPONSES TO PLAINTIFF JANE DOE I'S FIRST SET OF INTERROGATORIES TO
 DEFENDANT LAKIREDDY BALI REDDY

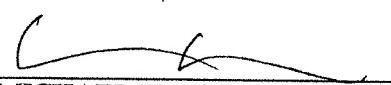
1 20. In YOUR PLEA AGREEMENT, YOU admit that "[b]etween 1986 and January 2000,
 2 [YOU] agreed with [YOUR] codefendants and others to bring Indian nationals into the United
 3 States on the basis of fraudulent visas." IDENTIFY all the "codefendants and others" with whom
 4 you "agreed. . . to bring Indian Nationals into the United States on the basis of fraudulent visas."
 5 RESPONSE: I have responded to discovery based on the advice of my criminal counsel to assert
 6 my Fifth Amendment privilege against self-incrimination where necessary. I have been informed
 7 that this court has ruled that I am not entitled to assert my Fifth Amendment rights against self-
 8 incrimination and that I must respond to discovery. I also understand that under Federal Rule of
 9 Civil Procedure 37, this Court has the power to enter monetary sanctions and other sanctions that
 10 could cause me and my family great economic harm. Although I respectfully disagree with the
 11 Court's Order I am providing the following answer because I fear this Court's sanctions. I am
 12 making no voluntary waiver of my Fifth Amendment rights against self-incrimination and I do
 13 not waive my rights to judicially challenge this Court's Order.
 14

15 See response to interrogatory 19.

17 Dated: 9-23-03

18 BISHOP, BARRY, HOWE, HANEY & RYDER

19 By:

20 
 MICHAEL W BOLECHOWSKI
 21 MARK C. RASKOFF
 DAVID L. HART

BISHOP, BARRY, HOWE, HANEY & RYDER
 A PROFESSIONAL CORPORATION
 2000 Powell Street, Suite 1425, Emeryville, California 94608
 Tel. No. (510) 596-0888 Facsimile (510) 596-0899

622-22888

22
 23
 24
 25
 26
 27
 28

SECOND AMENDED RESPONSES TO PLAINTIFF JANE DOE I'S FIRST SET OF INTERROGATORIES TO
 DEFENDANT LAKIREDDY BALI REDDY